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To: Rio Grande National Forest
1803 West Highway 160
Monte Vista, CO 81144

RE: Objection to the Village at Wolf Creek
Final Environmental Impact Statement (FEIS) and Draft Record of Decision

To whom it may concern,

Your decision to choose any alternative for the Village at Wolf Creek access project from my understanding was based on a Final Environmental Impact Statement that is poorly thought out, lacking information, and biased. Among the concerns I have include:

-The reasoning behind not including the original scenic easement from any exchanged land is that the Forest Service has no desire to manage private property, and that the county will administer this responsibility. This is a poor conclusion as the easement was part of the original land exchange in 1986 and is within character and context of the original exchange. The FEIS goes into very little detail of the original exchange; however, it may be assumed that the original exchange would not have been approved without such easement. Removing this easement at this point in time goes contrary to the terms of the original exchange. The terms of the original exchange are continuously referred to when determining reasonable use. If the Forest Service wishes to use the basis of the original exchange to determine reasonable use and enjoyment, it should also apply that the original terms of the scenic easement also be applied to the new exchange. It is stated that the Forest Service does not wish to monitor private property and infringe on their rights; however, it was agreed upon in the original exchange and therefore should automatically be included in any land exchange in context to the original one. The Forest Service regularly monitors the design and modifications of private buildings located with permit

on Forest Service land and this would not be something the Forest Service has not done before. While it may be a greater workload with the limited resources that the Forest Service has, it is in line with the original exchange and should be included in any other land exchanges related the 1986 exchange.

-The statements that a resort of this magnitude would not cause an increase in construction and road maintenance costs aside from a grade-separated interchange and associated acceleration and deceleration lanes is incorrect. If a grade-separated interchange is required, the only one within 120 miles of the project, obvious pressure will be placed on surrounding roads, enough to warrant added maintenance costs and potential expansion of highway 160. Currently when roads are snowpacked and with holiday visitation, highway 160 essentially becomes a parking lot. With any additional pressure on these already strained roads, expansion will need to be addressed and must be considered as an impact of the exchange. It would seem obvious that if there is so much traffic to warrant an overpass, this magnitude of traffic will impact the roads that lead to such overpass.

-The wording of the EIS underestimates impact and shows bias. For example, summertime population at the resort at build out according to table 4.11-3 during the month of July is 2,136. Meanwhile, under heading 4.11.2.5.1 it is stated a “potential summer population that *approaches* 2,000”. This is not in fact a population that “approaches”, it is one that exceeds. By using the term approaches, it downplays the impact of development, demonstrates a clear bias to downplay impact in responses, and goes contrary to the data present in table 4.11-3.

-When convenient, one set of comparison data is used and at other times it is thrown out. Data should either be wholly included or excluded, not included when found convenient. For example, when a commenter to the DEIS drew the comparison of the potential Village at Wolf Creek and I-70 resorts and their communities, the response from the FEIS preparers was, “Wolf Creek and Eagle County (Vail/Beaver Creek) are not comparable in terms of scale; Eagle County attracts approximately 2.7 million skier-visits annually, while WCSA attracts approximately 225,000 skier-visits annually. In addition, Wolf Creek Pass, and the impact area in general, is far more remote – from Front Range population centers as well as major airports – than Eagle County.” However, in a different section of the FEIS the same type of communities are included, “An assessment of Colorado communities such as Frisco or Steamboat Springs illustrates the impact of skier/visitor spending outside of a resort.”

-The exchanged parcel includes many more acres of National Forest bordering property. It is widely known that land bordering National Forest lands consistently have a higher property value than land adjacent to private land. It seems as though this was not factored into the appraised value of the exchanged land as it has a lower value than land to be acquired by the United States. Additionally, it seems as though the value of having highway frontage and a catalyst for property development, and the availability to develop a greater percentage of land due to there being less undevelopable wetlands on the exchanged land than the land acquired by the United States was not included in this appraisal either.

-It is not stated where the money for a cash equalization payment to the private party will be coming from.

-The objection period should have been extended due to numerous occurrences of the Forest Service Wolf Creek Access Project website being offline. When trying to access any documents in order to formulate an objection the website simply stated, "Project Not Found". This did not give stakeholders the full 45 days to examine any documents pertaining to the project during the objection period. This also did not provide stakeholders the opportunity to find out where they could even submit comments or objections in the first place.

As you can see from these few examples, and there are likely numerous more, any decision based on the FEIS was misled by bias and an incomplete examination of the original project. These inaccuracies and any decisions for an exchange should not be taken lightly as the impacts of an exchange will not only impact current generations, but future ones as well. All available resources should be applied the exchange to minimize environmental conflict, with one available resource being the enforcement of the original scenic easement on land that the United States will be losing.

I look forward to your response,

Adam Carroll